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January 30, 2017

VIA ECF

The Honorable Sarah Netburn
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 430
New York, New York 10007

Re: *BlackRock Balanced Capital Portfolio (FI), et al. v. Deutsche Bank Nat'l Trust Co., et al.*, No. 14 Civ. 9367 (S.D.N.Y.) (JMF) (SN)

Dear Judge Netburn:

On behalf of the Prudential Plaintiffs, we write in response to the Court's January 27, 2017 Order [ECF No. 207] and submit the following information regarding John Vibert:

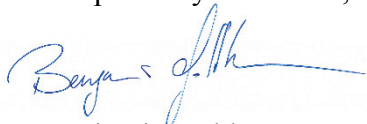
1. Mr. Vibert currently reports to Michael K. Lillard, Head of PGIM Fixed Income and Chief Investment Officer. Mr. Lillard is a Prudential Plaintiff custodian.
2. Richard Rogers, a Prudential Plaintiff custodian, is co-head of Structured Products with Mr. Vibert.
3. Peter Freitag, who also is a Prudential Plaintiff document custodian, reports to Mr. Vibert. Other Prudential Plaintiff document custodians with whom Mr. Vibert interacts include Arvind Rajan and Craig Dewling.
4. As set forth in Plaintiffs' responses and objections, the relevant time period for the collection of the Prudential Plaintiff documents is January 1, 2004, through the date of Plaintiffs' response.

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We thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Benjamin Galdston", with a long horizontal flourish extending to the right.

Benjamin Galdston

cc: Counsel of Record (via ECF)